

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

GAVEN PICCIANO,

Plaintiff,

v.

CLARK COUNTY, CLARK  
COUNTY JAIL, WELLPATH, LLC,  
and NAPHCARE, INC.,

Defendants.

No. 3:20-cv-06106-DGE

**JOINT MOTION FOR DISMISSAL  
WITH PREJUDICE OF DEFENDANT  
NAPHCARE, INC.**

**NOTE ON MOTION CALENDAR:**

**February 27, 2025**

Plaintiff Gaven Picciano (“Picciano”) and Defendant NaphCare, Inc. (“NaphCare”) have reached a complete settlement of all claims Picciano has against NaphCare. The parties jointly move pursuant to Federal Rule of Civil Procedure 41(a)(2) to dismiss with prejudice only those claims against NaphCare and without costs to either party. Voluntary dismissal of all claims against one or more defendants is proper under Rule 41(a)(2). *See Gen. Signal Corp. v. MCI Telecommc’ns Corp.*, 66 F.3d 1500, 1513 (9th Cir. 1995) (“Rule 41 is reserved for circumstances in which the result of the alleged dismissal is that one or all of the defendants are released from the action.”), *cert. denied*, 516 U.S. 1146 (1996).

Joint Motion for Dismissal with Prejudice of  
Defendant NaphCare, Inc.  
No. 3:20-cv-06106-DGE

WASHINGTON CIVIL & DISABILITY ADVOCATE  
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Dated this 26th day of February, 2025

Respectfully submitted,

/s/ Conrad Reynoldson

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Joint Motion for Dismissal with Prejudice of  
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/s/ David A. Perez

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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury under the laws of the State of Washington that on the date below, I filed the above with the court's ECF system which sent notice of the electronic filing of the proceeding document to all following attorneys of record and assistants in this proceeding:

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DATED this 26th day of February, 2025

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1 The Honorable David G. Estudillo  
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[PROPOSED] ORDER

The Court, having considered Plaintiff Gaven Picciano (“Picciano”) and Defendant NaphCare, Inc.’s (“NaphCare”) Joint Motion for Dismissal with Prejudice of NaphCare (“Joint Motion”), and being fully advised in the premises, now, therefore, it is hereby:

ORDERED that the Joint Motion is GRANTED and NaphCare is hereby dismissed from the case with prejudice.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

HONORABLE DAVID G. ESTUDILLO

PROPOSED ORDER GRANTING JOINT  
MOTION  
(No. 3:20-cv-06106-DGE) -1

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PROPOSED ORDER GRANTING JOINT  
 MOTION  
 (No. 3:20-cv-06106-DGE) –2

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